

Message

From: Lundelius, Diana [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=998193F6F9904EA4AB438772B62DD7EA-LUNDELIUS, DIANA]
Sent: 10/10/2019 1:11:12 PM
To: kirkland@sphere3env.com
Subject: RE: Question regarding Quad O and Quad Oa Reporting

If the affected storage tank was/is/continues to be subject to NSPS OOOO, then it would not be reported for NSPS OOOOa unless it was modified after September 18, 2015, making it subject to that rule instead of NSPS OOOO. An affected storage tank that was constructed after August 23, 2011, and prior to September 18, 2015, remains subject to NSPS OOOO if it has not been modified (see NSPS subpart A for what constitutes modification). If the affected tank was modified after September 18, 2015, and is now subject to NSPS OOOOa, then it would be reported under that rule instead. Compliance with NSPS OOOOa under those circumstances would be deemed compliant with NSPS OOOO also. I hope this provides you the clarification you requested.

Diana L Lundelius CHMM
Senior Enforcement Officer
Lean Six Sigma Black Belt
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"Courage is the willingness to proceed with positive change, even if the outcome is uncertain."

Connect with me on Linked In, <https://www.linkedin.com/in/diana-l-lundelius-chmm-a6b98917/>.

From: Kaleri, Cynthia <kaleri.cynthia@epa.gov>
Sent: Wednesday, October 9, 2019 12:17 PM
To: Gayle Kirkland <kirkland@sphere3env.com>
Cc: Lundelius, Diana <Lundelius.Diana@epa.gov>
Subject: RE: Question regarding Quad O and Quad Oa Reporting

I have passed your question on to the rule lead in our region, since I have changed jobs recently. Diana is currently out of the office, but should be able to help you when she returns. Thanks,

Cynthia J. Kaleri
Chief, Air Permits Section (ARPE)
Air Permits Monitoring & Grants Branch
Air and Radiation Division
214-665-6772 (office phone)

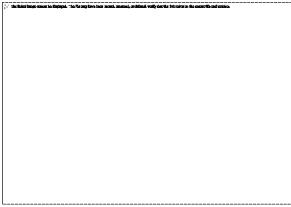
From: Gayle Kirkland <kirkland@sphere3env.com>
Sent: Wednesday, October 9, 2019 11:21 AM
To: Kaleri, Cynthia <kaleri.cynthia@epa.gov>
Subject: Question regarding Quad O and Quad Oa Reporting
Importance: High

Cynthia,

If you have an storage tank affected facility that was subject to Quad O and reported in the Quad O Annual Report prior to finalization of Quad Oa, do you continue to report that affected facility in Quad O Annual Report or do you add it to the Quad Oa Annual Report going forward and discontinue reporting under Quad O?

60.537(a)(d) (d) You are deemed to be in compliance with this subpart if you are in compliance with all applicable provisions of subpart OOOOa of this part.

Thanks,
Gayle



W. Gayle Kirkland | President

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